

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

BNVS Transport LLC and MEIN & MEEN  
TRUCKING, INC., individually and on behalf of  
all others similarly situated,

Plaintiffs,

vs.

C&K TRUCKING, LLC,

Defendants.

Case No. 1:20-CV-04305

HON. JOHN ROBERT BLAKEY

HON. M. DAVID WEISMAN

**DECLARATION OF JENNIFER M. KEOUGH OF JND LEGAL ADMINISTRATION IN**  
**SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION**  
**SETTLEMENT**

I, Jennifer M. Keough, declare as follows:

1. I am the Chief Executive Officer (CEO) of JND Legal Administration LLC (“JND”), that handles the administration of class action settlements. This Declaration is based on my personal knowledge, as well as upon information provided to me by experienced JND employees and Counsel for the Plaintiffs and Defendants (“Counsel”), and if called upon to do so, I could and would testify competently thereto.

2. I have more than 20 years of legal experience creating and supervising Notice and Claims Administration programs and have personally overseen well over 500 matters.

3. JND is a legal administration services provider with headquarters located in Seattle, Washington. JND has extensive experience with all aspects of legal administration and has administered hundreds of class action settlements. As CEO, I am involved in all facets of JND’s operation, including monitoring the implementation of our notice and claims administration programs.

4. JND submits this declaration to describe the settlement administration services expected in this case, including the receipt, processing, and managing of Defendant’s Class List data, and formatting, proofing, printing, and mailing by First Class mail a nine-page self-mailer Class Notice to all Class Members at their addresses as contained in the Class List.

5. I have reviewed the proposed class action Settlement and draft of the proposed Settlement notice. I have familiarized myself with the parties’ agreed upon methods and procedures for providing notice to the Class. Based on my more than two decades of experience in settlement administration I can attest that these procedures are consistent with the best practices currently used for providing best practical notice to Class Members in class actions such as this one.

6. JND has been informed by counsel and the settlement documents that there are approximately 1,010 class members and 100,617 Total Settlement Workweeks during the Class Period. The Settlement provides that within 7 days of preliminary approval by the Court, the Defendant will provide JND with the Class List data in a Microsoft Excel spreadsheet. This will include the Class Members’ names, last-known mailing addresses, last known telephone

number(s), last known email address(es), Workweek counts, and other information pertinent to administering the Settlement. JND will keep the Class List data private and confidential, and use it only for purposes of Settlement administration as provided in the Settlement Agreement.

7. Prior to mailing the Class Notice, as set forth in the Settlement Agreement, all Class Member addresses will be run through the National Change of Address (NCOA) database.<sup>1</sup> JND will update the Class List with any new addresses obtained from the NCOA search. In addition, all Class Members' Class Notices that are returned undeliverable by the post office with a forwarding address will be re-mailed by JND to the forwarding addresses. Class Notices returned as undeliverable without a forwarding address will be skip-traced one time and re-mailed to all addresses obtained as a result of the skip tracing. JND will provide the parties with weekly status reports that will include, among other things, outgoing and incoming mail statistics regarding the Class Notice mailing, the receipt of any opt-outs, objections, and/or Workweek disputes.

8. JND will process, review, and decide all Class Member disputes concerning the Workweeks information estimated in their Class Notice, and will maintain all records concerning all such disputes.

9. JND will establish and maintain a toll-free number staffed with live operators who will be available to answer Class Member questions.

10. JND will also establish and maintain a dedicated website that will contain the class notice and other information pertaining to the Settlement.

11. JND will open and maintain a Qualified Settlement Fund (QSF) account for this case. JND will prepare and file annual tax returns for the QSF account. JND will perform monthly account reconciliations on the QSF account.

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<sup>1</sup> The NCOA database is the official United States Postal Service ("USPS") technology product which makes change of address information available to mailers to help reduce undeliverable mail pieces before mail enters the mail stream. This product is an effective tool to update address changes when a person has completed a change of address form with the USPS. The address information is maintained in the database for 48 months.


12. JND will perform all calculations required by the Settlement Agreement, including using the Class List data to calculate each Class Member's net Settlement amount. Prior to mailing Settlement checks, JND will run the class list through the NCOA database again to obtain the discounted postal rate on the check mailing. JND estimates it will prepare, print, and mail Settlement checks with 1099s to approximately 1,010 Class Members. JND will process all undeliverable returned checks and will re-issue returned checks to Class Members as updated addresses are located through skip tracing or other research.

13. JND will electronically scan and preserve electronic copies of all incoming mail.

14. JND has estimated that fees and costs to perform all the above Settlement administration services to be \$54,309.

I declare under penalty of perjury under the laws of the State of Illinois that the foregoing is true and correct.

Executed on September 28, 2022, in Seattle, Washington.

A handwritten signature in black ink, appearing to read "Jennifer M. Keough", written over a horizontal line.

JENNIFER M. KEOUGH